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December 22, 1998

C. Lance Terry
*Senior Vice President
& Principal Nuclear Officer*

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

**SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NO. 50-445
CONFIRMATORY ORDER MODIFYING LICENSE FOR TU ELECTRIC
CPSES UNIT 1**

- REF:**
- 1) NRC Letter from Elinor G. Adensam to C. L. Terry dated May 20, 1998
 - 2) TU Electric Letter logged TXX-98256 from Mr. C. L. Terry to the NRC dated November 25, 1998

As part of the action plan for closure of the remaining open items associated with Comanche Peak Steam Electric Station (CPSES) Unit 1 Thermo-Lag fire barriers (Items 1 and 4) as described in the NRC Safety Evaluation Report (SER) dated May 22, 1996, and the Confirmatory Order sent via Reference 1, TU Electric responded to Reference 1 and stated that, "Texas Utilities (TU) Electric shall complete final implementation of Thermo-Lag 330-1 fire barrier corrective actions at Comanche Peak, Unit 1 described in the TU Electric submittals to the NRC dated April 9 and May 1, 1998, by December 31, 1998."

The April 9, 1998 letter stated that TU Electric will perform a fire endurance test to resolve the issues which remain open in NRC SER dated May 22, 1996. The objective of the test is to qualify the specimen fire barrier configurations including the as built 12 inch cable trays, 2 inch conduits, and silicone foam firestops as well as the potential upgrade raceway configurations. The May 1, 1998, letter was in response to the NRC request in which Mr. T. J Polich of your staff informed TU Electric that the preliminary review by the NRR staff of the test criteria provided in the April 9, 1998, letter indicated that the criteria are adequate, and the NRC staff believes that TU Electric has resolved previous comments. In addition, Mr. Polich requested a copy of the test plan for the hot oven insulation resistance (IR) testing, and the time and place for both the fire endurance test and insulation resistance testing. The May 1, 1998, letter responded to this request and provided the draft copy of the test plan for the hot oven insulation resistance (IR) testing, and the time and place for both the fire endurance test

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and any hot oven insulation resistance testing that subsequently would be required as a consequence of the fire endurance testing. Copies of both the April 9 and May 1, 1998, letters from TU Electric are enclosed for your expedience in the review of the subject matter.

Via Reference 2, TU Electric informed the NRC that it had performed a fire endurance test on October 27, 1998, and provided preliminary results of the test. Additionally, via this letter (Reference 2), TU Electric advised the NRC Staff that it was in compliance with the confirmatory order and that the rework schedule as stated in response to the aforementioned confirmatory order remains effectu. .

Via this letter TU Electric is listing the items below which have been completed to date to bring the Thermo-lag barriers in compliance with the open items described in the NRC Safety Evaluation Report (SER) dated May 22, 1996, and the Confirmatory Order (Reference 1).

- Airdrops 1 ½ inch and 2 inch have been upgraded (SER open item)
- Silicone foam firestops (SER and confirmatory order open item, no additional rework is required based on favorable test results)
- Conduits 1 ½ inch (SER open item, these conduits have been upgraded)
- 2 inch conduits have been upgraded based on favorable test results of the upgraded configuration (SER and confirmatory order open item)
- 12 inch cable tray (SER and confirmatory order open item, no additional rework is required based on favorable test results)

TU Electric believes that the Thermo-Lag raceway barriers at CPSES Unit 1 are functional, this is based on the 7 day cure time previously accepted by the NRC in its SSER 27 section 9.5. Additionally, TU Electric asserts that all actions required of TU Electric by the confirmatory order are complete and the confirmatory order is in effect closed.

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The only matter left open for this subject matter is the submittal of the test reports, an action not covered by the confirmatory order, the schedule of which has verbally been communicated to Mr. T.J Polich of your staff. Should you have any questions or require additional information, please contact Obaid Bhatti at (254) 897-5839.

This correspondence contains no new commitments regarding CPSES Units 1 and 2.

Sincerely,

C. L. Terry

C. L. Terry

By: *Roger D. Walker*

Roger D. Walker
Regulatory Affairs Manager

OB:grj
Enclosures

cc: Mr. E. W. Merschoff, Region IV
Mr. T. J. Polich, NRR
Mr. J. I. Tapia, Region IV
Resident Inspectors, CPSES